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April 22, 2016

VIA ECF

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square, Room 415
New York, NY 10007

**Re: United States v. Francis Lorenzo, et al.,
Docket No.: 15 cr. 706 (VSB)**

Honorable Judge Broderick:

I write to request a slight modification of one release condition (home detention) for Francis Lorenzo. I respectfully request the Court permit Mr. Lorenzo to abide by a curfew from 11:00 P.M. to 7:00 A.M., seven days per week, with the present electronic monitoring system remaining in place. The Government (through AUSA Daniel Richenthal) does not object to my request, nor does Pretrial Services (via Officer John Moscato).

On October 9, 2015, United States Magistrate Judge Pitman released Mr. Lorenzo on, inter alia, the following conditions: \$2,000,000 personal recognizance bond cosigned by Mr. Lorenzo's mother, his brother, and two (2) sisters who reside in the United States, plus five (5) financially responsible persons, and secured by \$500,000 cash, the Riverdale property in which Mr. Lorenzo's mother resides, and the residence of Mr. Christian Battres; home detention with electronic monitoring; travel limited to the SDNY and EDNY; and surrender of all travel documents. (Doc. 30).

Mr. Lorenzo is still living with his mother at their residence in Riverdale, New York, per his bond conditions. Since his release, Mr. Lorenzo has been permitted to leave his residence daily for employment and personal matters. On March 16, 2016, Mr. Lorenzo pled guilty to a six (6) count Superseding Information. Mr. Lorenzo has not violated any conditions of his release to date.

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Thank you for considering this request.

Respectfully submitted,


For BRIAN H. BIEBER

BHB/pg

Cc: Daniel Richenthal, AUSA (via e-mail only);
Rahul Mukhi, AUSA (via e-mail only);
Janis Echenberg, AUSA (via e-mail only)